

**VERONICA A.F. NEBB**

City Attorney, SBN 140001

**BY: KATELYN M. KNIGHT**

Assistant City Attorney, SBN 264573

**CITY OF VALLEJO**, City Hall

555 Santa Clara Street, 3<sup>rd</sup> Floor

Vallejo, CA 94590

Tel: (707) 648-4545

Fax: (707) 648-4687

Email: katelyn.knight@cityofvallejo.net

Attorneys for Defendant CITY OF VALLEJO

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

NEFTALI MONTERROSA, individually and  
as co-successor-in-interest to Decedent SEAN  
MONTERROSA; NORA MONTERROSA,  
individually and as co-successor-in-interest to  
Decedent SEAN MONTERROSA;  
MICHELLE MONTERROSA, individually;  
ASHLEY MONTERROSA, individually,

Plaintiffs,

vs.

CITY OF VALLEJO, a municipal  
corporation; JARRETT TONN, individually,  
and, Vallejo police officers DOES 1-25,  
inclusive,

Defendants.

**Case No: 2:20-cv-01563-DAD-DB**

**DEFENDANT CITY OF VALLEJO'S  
NOTICE OF MOTION AND MOTION  
FOR PROTECTIVE ORDER**

Date: January 5, 2023

Time: 10:00 a.m.

Ctrm: 27

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that on January 5, 2024 at 10:00 a.m. in Courtroom 27 of the  
above Court, Defendant City of Vallejo will and hereby does move for a protective order to limit  
the scope of Plaintiffs' deposition subpoena issued pursuant to FRCP 30(b)(6).

This motion is based on this Notice of Motion and Motion, the Joint Statement re  
Discovery Disagreement which shall be filed next week, and on such other written and oral

1 argument as may be presented to the Court.  
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3 DATED: December 14, 2023

Respectfully submitted,

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5 /s/ Katelyn M. Knight

KATELYN M. KNIGHT

Attorneys for Defendant

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